

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law

100 Lafayette Street, Suite 501  
New York, NY 10013

Franklin A. Rothman  
Jeremy Schneider  
Robert A. Soloway  
David Stern

Tel: (212) 571-5500  
Fax: (212) 571-5500

Rachel Perillo

September 14, 2020

**Via ECF**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Mustapha Raji  
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. On May 27, 2020, the Court ordered Mr. Raji's release on bail subject to a \$100,000 personal recognizance bond to be signed by three financially responsible persons and secured by \$10,000 in collateral. On July 27, 2020, the Court's Order was modified to require two financially responsible co-signers and one moral suasion co-signer. Mr. Raji was released from custody on August 19, 2020, and is now residing at his home in Hollywood, Florida. His bond conditions restrict travel to the Southern and Eastern Districts of New York and the Southern District of Florida (with the approval of Pretrial Services to districts in between for the purposes of traveling between the foregoing districts).

This letter is respectfully submitted, with the consent of pretrial services and the government, to request a temporary modification of Mr. Raji's travel restrictions to allow him to travel to Orlando, Florida (located in the Middle District of Florida) on September 17, 2020 in order to attend a medical appointment. As the Court is aware from Mr. Raji's bail application, he suffers from various medical conditions, and prior to his arrest, was being treated at the Orlando Health Heart Institute in Orlando, Florida. On September 17, he is scheduled to have his first appointment since being released on bail. If this application is granted, Mr. Raji intends to drive to Orlando that day<sup>1</sup> and will return to his home in Hollywood after the appointment.

As mentioned, Mr. Raji's pretrial services officer in the Southern District of Florida, Jason Jacoby, consents to this request, and the government, by AUSA Eun Young Choi, also consents.

<sup>1</sup> Mr. Raji does not drive and will be driven to his appointment by a friend.

Hon. Jesse M. Furman  
September 14, 2020  
Page Two

If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Eun Young Choi (By ECF)  
AUSA Dina McCleod (By ECF)  
USPO Jason Jacoby (By Email)